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## BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

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WILLIAM A. MUNDELL

Chairman

JIM IRVIN

Commissioner

MARC SPITZER

Commissioner

IN THE MATTER OF GENERIC INVESTIGATION)  
ON INDUSTRY PETITION FOR APPROVAL OF )  
AN NPA RELIEF PLAN FOR THE 520 NPA )

DOCKET NO. T-00000F-99-0641

DECISION NO. 63386ORDER

Open Meeting  
February 13 and 14, 2001  
Phoenix, Arizona

**BY THE COMMISSION:**

Competition in the local telephone market, and the increasing demand for telephone numbers to provide second lines, fax machines, modems, wireless service and new enhanced services has resulted in a projected exhaust of the 520 area code in late-2001 (NANPA April, 2000 analysis, updated October 6, 2000). The 520 area code was established in 1995 for all locations outside of the Phoenix metropolitan and suburban area when the first exhaust of the 602 area code occurred.

FINDINGS OF FACT**I. BACKGROUND AND PROCEDURAL HISTORY****A. State Proceedings**

1. On November 8, 1999, the North American Plan Administrator ("NANPA") Lockheed Martin IMS (currently known as NeuStar, Inc. ["NeuStar"]) on behalf of the Arizona Telecommunications Industry ("Industry") filed a Petition for Approval of a NPA Relief Plan for the 520 Numbering Plan Area (NPA). In its petition the Industry estimates that without NPA relief the supply of central office codes will exhaust in late 2001.

2. The Industry was unable to reach consensus<sup>1</sup> on a final relief plan and asked the Commission to approve one of two proposed relief plans for the 520 NPA. The two proposed Industry

<sup>1</sup> Consensus is established when substantial agreement has been reached among interest groups participating in the consideration of the subject at hand. ... Substantial agreement means more than a simple majority, but not necessarily unanimity., INC97-0414-016, November 13, 2000.

1 relief plans are: a geographic split with the Tucson/Nogales areas retaining the 520 NPA, or an all-  
2 services overlay for the entire geographic area encompassed by the 520 NPA.

3       3. On March 6, 2000, Commission Staff requested NANPA schedule a conference call with  
4 the Industry in an effort to arrive at an Industry consensus on a single relief plan. In response to this  
5 request NANPA scheduled a conference call for April 19, 2000. Following a review of the two  
6 proposed relief plans the Industry reached consensus on an overlay covering the entire geographic area  
7 presently served by the 520 area code as the Industry recommended relief plan for the 520 NPA.

8       4. On May 8, 2000, Commission Staff requested that NANPA update the plan that was  
9 filed with its Petition to reflect the subsequent activity by the Industry and the consensus  
10 recommendation that was arrived at. On June 1, 2000, NANPA filed an Addendum to its petition in  
11 the above-captioned proceeding to notify the Commission of the Industry's consensus decision to  
12 recommend an all-services overlay as the method of relief for the 520 NPA.

13       5. On June 10, 2000, the Tucson rate center was consolidated from seven rate centers to one  
14 expanded rate center in an effort to conserve NXXs. The local calling area for Tucson consumers was  
15 not changed by this consolidation.

16       6. On June 14, 2000, Commission Staff invited affected telecommunications service  
17 providers and other interested parties to submit written comments to the Commission on the Industry  
18 proposed overlay relief plan. Parties were requested to file written comments on or before June 30,  
19 2000, and reply comments on or before July 14, 2000. Initial Comments were filed by AT&T  
20 Communications of the Mountain States, Inc. (AT&T"), Cox Arizona Telecom, L.L.C. ("Cox"),  
21 Citizens Mohave Cellular ("Mohave Wireless"), WorldCom, Inc. ("WorldCom") and U S WEST  
22 Communications, Inc., n/k/a/ Qwest Corporation. Citizens Utilities Company ("Citizens") filed  
23 comments prior to Staff's request. Reply Comments were filed by Cox and WorldCom.

24       7. On November 10, 2000, NANPA responded to a Staff request to analyze an additional  
25 relief alternative. This alternative modified the Industry split alternative by removing the Miami,  
26 Globe and San Carlos rate areas in Gila County from the area that would retain the 520 NPA. In  
27 addition, the 520 NPA as represented in the Industry split alternative would be expanded to include  
28 the remaining rate areas in Pima County and all rate areas in Cochise County.

1        8. The Commission held a series of public input hearings around the State in an attempt to  
2 garner input on the public's preference with respect to the recommended all-services overlay as well  
3 as the proposed split option which had been considered by the Industry. During the months of  
4 October and November 2000, public input hearings were held in Kingman, Tucson, Flagstaff and  
5 Prescott.

6 **B. Related Federal Proceedings**

7        9. On December 23, 1999, the Arizona Corporation Commission ("Commission") petitioned  
8 the Federal Communications Commission ("FCC") for "Expedited Delegation of Authority to  
9 Implement Number Conservation Measures." The Commission requested additional authority to: (1)  
10 implement mandatory thousands-block number pooling; (2) ensure efficient number use practices such  
11 as fill rates or sequential number assignment; (3) establish interim mandatory number utilization data  
12 reporting and forecasting requirements; (4) establish auditing procedures and implement random  
13 audits; (5) require the return of unused NXX codes (prefixes) by carriers to the code administrator; and  
14 (6) require the return of unused or under-utilized portions of NXX codes to the Pooling Administrator  
15 when one is selected.

16        10. On May 1, 2000, the Commission filed with the FCC a supplement to its Petition for  
17 Delegated Authority pursuant to paragraph 170 of the FCC's Numbering Resource Optimization Order  
18 (CC Docket No. 99-200).

19        11. On July 20, 2000, the FCC addressed the Delegation of Authority petitions of Arizona  
20 and several other states (In the Matter of Numbering Resource Optimization, et. al., Docket No. 99-  
21 200 et. al., Order [rel. July 20, 2000]). The FCC conditionally granted Arizona the authority to  
22 conduct audits of carriers' use of numbering resources and the authority to institute thousands-block  
23 number pooling in the 480, 520, 602 and 623 NPAs. Other aspects of the Commission's Petition were  
24 not ruled upon because the FCC, in the Number Resource Optimization Order, had already addressed  
25 those specific numbering resource optimization measures.

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1 **II. RELIEF ALTERNATIVES**

2 **A. The "Geographic Split"**

3 12. A "Geographic Split" involves splitting the affected area into two separate NPA codes.  
4 Under this relief method, the geographic significance of area codes is retained since it divides the  
5 original area code and geography into two separate area codes and geographies.

6 13. The customers in the old area code are least affected since they retain the same 10-digit  
7 telephone number. Subscribers in the second area code keep the last 7-digits of their existing  
8 telephone number but have a new area code.

9 14. Under the Geographic Split, 7-digit dialing for local calling would continue within each  
10 NPA; however, 10-digit dialing would be required between NPAs or area codes.

11 **B. The "Overlay"**

12 15. With the "Overlay" method of relief, the new NPA or area code would be "overlaid" on  
13 top of the existing 520 area code. This means that all existing customers would keep their current  
14 10-digit telephone number with the 520 area code. As NXXs in the overlay code are assigned to  
15 carriers, most new customers and other new service requests would receive telephone numbers in the  
16 new NPA. This is what is commonly referred to as an "all services overlay".

17 16. Under existing FCC rules and regulations, implementation of an Overlay is subject to the  
18 following condition:

- 19 a. Mandatory 10-digit dialing for all local telephone calls in the future in the affected  
20 area regardless of whether the calls are within or between NPAs.

21 **III. POSITION OF INTERESTED PARTIES AND AFFECTED CARRIERS**

22 **A. Affected Carriers**

23 17. Of the affected carriers who have filed written comments, AT&T, Cox and WorldCom  
24 supported a geographic split. However AT&T stated that while its preference was a geographic split  
25 it would also support an overlay subject to certain conditions. Citizens, Mohave Wireless and Qwest  
26 supported an all-services overlay.

27 18. The positions taken by those commenters favoring an all-services overlay may be  
28 generally summarized by the following:

- a. Allows existing customers to keep their current ten-digit telephone number.
- b. Cellular customers are not required to have their handsets reprogrammed.
- c. Least cost for both customers and rural service providers.
- d. Future area codes can be added without customers having to make any more changes.
- e. Does not require customers who were required to take a number change in 1995 to be subject to another.

19. The positions taken by those commenters **not** in favor an all-services overlay may be generally summarized by the following:

- a. Requires the loss of all seven-digit local dialing.
- b. Lose ability to associate an area code with a unique geographic area.
- c. Consumer confusion may arise from different area codes being assigned in the same home, business or neighborhood.
- d. May not alleviate the cost to customers for such things as revisions to advertising, stationary or other material containing a seven-digit telephone number, reprogramming equipment with automatic dialers or revisions to PBX systems.
- e. Can negatively impact entry into the market place by competitive local exchange carriers.

20. Additional positions taken by those commenters favoring a geographic split may be generally summarized by the following:

- a. A split is competitively neutral with respect to telecommunications providers.
- b. Many consumer surveys indicate a customer preference for geographic splits versus all service overlays.
- c. Most widely accepted method of NPA relief.
- d. The very large geographic area is conducive to a split.
- e. Rural areas would not be required to implement mandatory ten-digit local dialing prior to urban areas.

21. Additional positions taken by those commenters **not** in favor of a geographic split may be generally summarized by the following:

- a. A geographic split is a less permanent solution.
- b. Future relief may be more readily accomplished through additional overlays.

22. Unlike wireline phones, wireless phones need to be physically reprogrammed to accommodate a change in area code. Grandfathering of wireless codes, in the event of a geographic split, is an option that can mitigate the burden to customers and wireless service providers of reprogramming phones. The Industry Petition is silent on a recommendation. However, examination of the minutes of the Industry September 27, 1999 meeting reveals varying positions concerning the issue. Among the comments expressed were that the Commission might allow grandfathering, that limited grandfathering for specific NXXs was allowed when NPA 602 relief was addressed and that at least one wireless provider was not in favor of any grandfathering because it requires ten-digit dialing between wireline and wireless phones in the same service area. Finally, one wireless service provider, in its comments, requested that the option to grandfather codes be allowed subject to a condition that duplication of any grandfathered codes would not be requested in the new NPA.

#### **B. Public Comment Meetings**

23. The Commission held a series of public comment meetings around the State at locations within the 520 area code in an attempt to garner input on the public's preference with respect to the relief options under consideration. During the months of October and November 2000, public comment meetings were held in the cities of Kingman, Tucson, Flagstaff and Prescott. Because attendance was relatively light, the meetings did not provide much insight into which relief method the public preferred. Of the customers present at the meetings, opinion was somewhat more favorable toward the "geographic split" method of relief than the "overlay" method.

24. A relatively small number of written public comments have been sent to the Commission for consideration as part of this proceeding. In general, residential customers favored a "geographic split" as the relief method while business customers favored an "overlay". Several commenters expressed the belief that splitting into more than two NPAs would be advantageous.

25. In addition, several customers have provided opinions via telephone calls to the Commission's Consumer Services Division. For these customers, the majority were in favor of a "geographic split" as the relief method.

28 ...

1 **IV. RELIEF OBJECTIVE OR GOALS**

2 26. In examining this issue, the Commission must weigh the importance of a variety of  
3 factors that affect all or a portion of the telecommunications users in the 520 area code. Compounding  
4 the difficulty of this task is the knowledge that regardless of the plan chosen, all of the options include  
5 attributes that both consumers and the industry may find confusing, disruptive or objectionable.

6 27. The following four considerations or objectives are either identified in Industry  
7 guidelines or FCC Orders on NPA exhaust, and thus it is important that the Commission consider them  
8 in making its decision. First, the plan selected should maximize the time frame before another  
9 disruptive NPA relief action is necessary. Second, the relief method selected should be competitively  
10 neutral. Third, the plan should minimize the total costs to all affected parties. Fourth, the relief option  
11 chosen should be the least confusing and disruptive to customers and take into account customer  
12 preferences.

13 **A. Maximize Time Before Additional Relief Is Required**

14 28. A common concern, and one expressed in public comments, relates to the relief planning  
15 process in general and the length of the relief period for the selected method. It is important to try to  
16 avoid another exhaust situation for as long as possible because of the disruption and confusion to the  
17 public caused by changes in telephone numbers.

18 29. NANPA Code relief guidelines recommend that proposed relief alternatives shall cover  
19 a period of at least five years beyond the predicted date of exhaust, that customers who undergo  
20 number changes not be required to change again for a period of eight to ten years and that, in the case  
21 of splits, all of the codes shall exhaust about the same time. Both of the alternatives considered prior  
22 to the Industry consensus decision were consistent with this criteria.

23 Split Life Expectancy: 520 NPA - approximately 159 months  
24 New NPA - approximately 148 months  
25 Overlay Life Expectancy: - approximately 149 months

26 30. The additional relief alternative that NANPA analyzed at the request of Staff also meets  
27 industry guidelines for assignment of a relief NPA. The projected lives of the 520 area code and the  
28 new relief area code are as follows:

520 NPA - approximately 132 months  
New NPA - approximately 168 months

31. Industry Guidelines recommend that the Commission not adopt any relief measure that is estimated to last less than five years. According to Industry estimates, each of the relief methods under consideration meet this criteria. Given the inherent difficulties in forecasting demand for NXXs ten or more years in the future, the expected life for each of the alternatives does not differ significantly. In addition, for either of the "geographic split" options, future implementation of number pooling in the NPA that contains the Tucson metropolitan area, either as part of a national implementation or a state trial, should extend the forecast life of that NPA.

**B. The Relief Option Chosen is Competitively Neutral**

32. Another important objective identified in FCC Orders on NPA Exhaust should be to minimize any adverse impact upon emerging competition in the local telephone market in the affected area. Some telephone providers, particularly competitive local exchange carriers ("CLECs"), oppose an "overlay" because it places them at a competitive disadvantage.

33. Regardless of the plan selected, NPA relief may have some effect on competition. The crux of this issue, however, centers on the new service provider's ability to have access to the supposedly more desirable NXX codes in the 520 NPA in the event an "overlay" is the selected relief method.

34. Many of the anti-competitive concerns of an "overlay" can be alleviated where Local Number Portability ("LNP") has been implemented; primarily in the Tucson calling area. With LNP, existing telephone subscribers may change carriers and keep their existing telephone numbers. Future implementation of number pooling, which is based upon LNP capability, will further alleviate this concern.

35. However, since LNP capability is not ubiquitously deployed in rural Arizona, if competition were to develop in these communities, a "geographic split" would be more competitively neutral than an "overlay". This is because the "geographic split" method provides a pool of new NXXs in each NPA giving new service providers access to those codes on an equal basis with the incumbent carrier.



1           C.    Minimizes Costs to Both Consumers and the Industry

2           36.   Either method of NPA relief comes with a price tag to Industry and consumers. With a  
3 "geographic split", costs will be incurred by approximately 40 to 50 percent of the existing 520  
4 customers to change their current NPA to the new NPA. The costs to business will include changing  
5 vehicle markings, stationery and other printed material, promotional materials, and anything else that  
6 displays a company's telephone number. Other costs that may be incurred would include  
7 reprogramming of customer premises equipment, cellular telephones and alarm systems. Both  
8 residential and business customers would have to notify clients, friends and family of their new NPA.  
9 Any future NPA "geographic splits" would result in similar costs every time additional relief is  
10 required.

11          37.   On the other hand, there are also substantial costs associated with an "overlay".  
12 Businesses, where they are not already doing so, will bear the costs of printing all 10-digits of their  
13 number on stationery, vehicles, promotional material and anything else that displays the company's  
14 telephone number. All telephone systems, alarm systems and customer premises equipment will have  
15 to be reprogrammed to accommodate mandatory 10-digit local dialing. Both residence and business  
16 customers would have to revise speed-call lists with the full 10-digits of a telephone number contained  
17 in the lists.

18          38.   Both relief methods will also require changes in central office switch databases, dialing  
19 plans and routing translations. Substantial direct and indirect costs, to Industry and consumers alike,  
20 will be incurred under either the "geographic split" or the "overlay" relief method. While the Industry  
21 did not submit any specific cost data for either a "geographic split" or an "overlay" (Citizens Utilities  
22 estimated the average cost of a "split" at \$35,000 per central office and \$2.00 per directory number),  
23 Staff believes that, in the long run, the "overlay" may offer a cost advantage because Industry area code  
24 relief activity is minimized and fewer customers may have to incur costs.

25           D.    Minimizes Confusion and Disruption to Customers

26          39.   The final factor relates to the adverse impacts upon consumers under both relief methods.  
27 The impact upon customers is perhaps the single most important factor that the Commission must  
28 consider when making its decision. The disruption and confusion caused by changes in telephone

1 numbers affect not only customers located in the current 520 NPA, but these changes also affect callers  
2 in other parts of the state and country who place calls to the affected area. Neither the "geographic  
3 split" nor the "overlay" will be completely transparent.

4 40. Examination of the record reveals that both methods of relief have advantages and  
5 disadvantages as far as their impact on both end-users and telecommunications providers. The  
6 "geographic split" has been in existence longer and has been successfully implemented in many  
7 metropolitan and rural areas. Residential customers, in particular, appear to prefer the "geographic  
8 split" for a variety of reasons. However, "overlays" have become increasingly popular in some areas  
9 of the country. Staff believes overlays may be better suited in metropolitan areas where the geographic  
10 area effected is relatively small.

11 41. A "geographic split" will require between 40 to 50 percent of the existing 520 customers  
12 to change their current telephone numbers. The "overlay does not require any existing customers to  
13 change their telephone numbers, and therefore, avoids this considerable initial disruption to almost half  
14 of the customers in the affected 520 area code.

15 42. The "geographic split" may be less confusing to consumers when one considers that the  
16 geographic identity of area codes remains intact. Thus, if a customer wants to call a friend in Yuma,  
17 for example, he or she should be able to associate that location with a particular area code. Also  
18 alleviated is the potential confusion created by having different area codes in the same neighborhood,  
19 residence or business location. The results of a 1998 Commission poll of subscribers in Maricopa  
20 County affected by the exhaust of the 602 NPA found that of those surveyed, a "geographic split" was  
21 favored over an "overlay" by a 2 to 1 margin.

22 43. From a customer perspective, that alternative "geographic split" method Staff requested  
23 be analyzed may be an attractive option because, to the extent that rate center boundaries allow, it  
24 approximates County lines making it easier to remember what communities are in which NPA.

25 44. Dialing patterns is another concern that is minimized with a "geographic split". Many  
26 commenters believe that retaining 7-digit dialing for local calls lessens confusion for consumers. They  
27 also argue that an "overlay's" mandatory 10-digit dialing for local calls will be particularly difficult for  
28 older citizens and children.

1        45. The Commission must attempt to find a reasonable balance for consumers, taking into  
2 account the large geographic area covered by the current 520 area code that includes both rural and  
3 urban communities. Taking all of the above factors into account, it appears a "geographic split" most  
4 closely achieves the balance desired, for the Tucson and outlying area.

5        V.        **NUMBER CONSERVATION MEASURES**

6        46. Rate center consolidation was implemented in the Tucson calling area on June 10, 2000.  
7 This will reduce the number of NXX codes new service providers need to compete within that calling  
8 area.

9        47. On March 31, 2000, the FCC released an Order (In The Matter of Numbering Resource  
10 Optimization, Docket No. 99-200, ["Number Optimization Order"]) with the stated goals of ensuring  
11 that the limited numbering resources of the North American Number Plan ("NANP") are used  
12 efficiently and that all carriers have the numbering resources they need to compete in the rapidly  
13 growing market place. The FCC adopted a single system for allocating numbers in blocks of 1,000,  
14 wherever possible, and establishing a plan for national rollout of thousands-block number pooling.

15        48. Furthermore, in the Number Optimization Order the FCC adopted administrative and  
16 technical measures that will promote more efficient allocation and use of NANP resources. Among  
17 the measures adopted are:

- 18                    a. A uniform set of categories of numbers for which carriers must report their  
19                    utilization.
- 20                    b. A mandatory utilization data reporting requirement.
- 21                    c. A process that requires carriers to demonstrate that they need numbering  
22                    resources to provide services.
- 23                    d. A utilization threshold framework to increase carrier accountability.
- 24                    e. Numbering resource reclamation requirements to ensure the return of  
25                    unused numbers to the NANP inventory.
- 26                    f. A mandate that carriers fill their need for numbers out of "open" thousands  
27                    blocks before beginning to use numbers from new blocks.

1       49. The FCC continues to develop, adopt and implement a number of strategies to ensure that  
2 the numbering resources of the NANP are used efficiently. In its NRO Second Report and Order (In  
3 the Matter of Number Resource Optimization, et. al., Second Report and Order, et. al., Docket No. 99-  
4 200, et. al., Released December 29, 2000), the FCC adopted additional measures to promote efficient  
5 allocation of NANP resources which include:

- 6               a. Establishment of a utilization threshold of 60 percent (increasing to 75  
7 percent over three years) that carriers must meet before receiving additional  
8 numbering resources in a given rate center.
- 9               b. Not setting a transition period between the time CMRS carriers must  
10 implement LNP (November 24, 2002) and the time they must participate  
11 in mandatory number pooling.
- 12               c. A comprehensive audit program to verify carrier compliance with federal  
13 rules and orders and industry guidelines.

13       50. Commission Staff requested Industry comment on whether adoption of number pooling,  
14 as defined in the Federal Communication Commission's ("FCC") Order on Number Resource  
15 Optimization (CC Docket No. 99-200) should be incorporated into the Industry recommended relief  
16 plan. One commenter was in favor but provided no substantive support for the recommendation.  
17 Other commenters recommended that number pooling not be included as part of the relief plan. A  
18 summary of the reasons given in support of this position is:

- 19               a. The FCC has reiterated its position that number conservation measures are  
20 not to be substituted for timely area code relief.
- 21               b. The FCC has established a national plan to roll out number pooling in the  
22 top 100 Metropolitan Statistical Areas.
- 23               c. Number Portability Administrative Center software upgrade (Release 3.0)  
24 is currently scheduled for the Western Region mid-February 2001.
- 25               d. A state pooling trial may have higher implementation costs for the Industry  
26 and will require a state specific cost recovery mechanism.
- 27               e. The selection of a state Pooling Administrator may be superceded by the  
28 FCC's selection of a national Pooling Administrator.

f. Limited benefit can be achieved in an area code at risk for short-term exhaust.

51. In a separate proceeding to be brought before the Commission, implementation of a State number pooling trial prior to the national rollout, and the issues associated with it, will be addressed. However, neither the national rollout of number pooling or implementation of a State number pooling trial, alleviates the necessity for a relief plan for the 520 NPA because it is so close to projected exhaust.

## **VI. IMPLEMENTATION ISSUES**

### **A. Permissive Dialing Periods**

52. Staff notes that a four-month permissive dialing period is the shortest period recommended in the Industry Guidelines. However, implementation of mandatory dialing prior to a traditionally busy holiday season could prove to be detrimental to both business and residential customers. Therefore, Staff recommends that a permissive dialing period commence June 23, 2001, mandatory dialing/recorded announcement begin on January 5, 2002, and activation of the relief area code occur on March 9, 2002.

### **B. Future NXX Code Allocation**

53. On January 3, 2001, Staff requested the NPA Relief Planner for Arizona to determine the quantity of NXX codes available for assignment in the 520 NPA as of December 31, 2000 and the average number of new codes being assigned per month. On that date, there were 101 NXX codes available and NXX code assignments were averaging six codes per month.

54. Staff recommends that NXX code usage be closely monitored, as any spike in usage could make it necessary for NeuStar NANPA, the current NXX code administrator for the 520 NPA, to declare the 520 NPA in jeopardy. A jeopardy situation is serious because it indicates that the forecasted and/or actual demand for NXX codes will exceed the known supply during the planning/implementation interval for NPA relief.

55. In general, during a jeopardy situation the NXX Code Administrator attempts to prevent NXX exhaustion by obtaining Industry consensus on a method of NXX code allocation. If the Industry fails to reach consensus, the Code Administrator would request the Commission to establish an allocation procedure. Staff recommends that the Commission require prior notification to Staff by

1 NANPA before any declaration of jeopardy in the 520 area code and before any new allocation  
2 procedure is implemented.

3 **C. Consumer Education**

4 56. Staff recommends that the Commission require the Industry to develop a comprehensive  
5 customer education program similar to the program used in the Phoenix metropolitan area in  
6 conjunction with implementation of the "geographic split" of the 602 NPA.

7 57. Staff believes that customer education is a key element in the successful implementation  
8 of a relief plan. Further, since everyone, including the wireless and new wireline entrants, benefits  
9 from the successful introduction of the new NPA, all service providers should pay a pro-rata share of  
10 the customer education program based on the number of NXX codes they control.

11 **VII. STAFF RECOMMENDATION**

12 58. Upon examination of the Petition for NPA Relief Plan for the 520 NPA filed by Industry,  
13 the Industry consensus recommendation, Industry and public comments and Findings of Fact Nos.  
14 1 through 57, Staff has recommended:

- 15 a. That the Commission adopt a two-way geographic split with the existing 520 rate  
16 centers within Cochise, Pima, Pinal and Santa Cruz counties retaining the 520 NPA.  
17 (Ajo, Benson, Bisbee, Blackwater, Bowie, Casa Blanca, Casa Grande, Cascabel,  
18 Coolidge, Douglas, Elfrida, Eloy, Florence, Hayden, Komatke, Lone Butte, Maricopa  
19 Village, Maricopa, Nogales, Patagonia, Pearce, Portal, Sacaton, San Manuel, San  
20 Simon, Santa Rosa, Sasabe, Sells, Sierra Vista, Stutonic, Sunizona, Superior,  
21 Tombstone, Tucson, West San Simon, Whitlow and Willcox rate centers.) The  
22 remaining area would be assigned the new area code.
- 23 b. That the Commission order permissive dialing begin on June 23, 2001, mandatory  
24 dialing begin on January 5, 2002 and the new NPA recorder announcement be in  
25 effect for all NXXs moved to the new NPA until at least March 9, 2002. NXXs  
26 reassigned from the new NPA into the 520 NPA may not have an effective date prior  
27 to March 9, 2002.
- 28 c. That the Industry develop a comprehensive customer education program and that a  
pro-rata share of the costs of such customer education program be paid by all  
telecommunications service providers based upon the number of NXX codes they  
control.
- d. That wireless service providers be allowed the option to grandfather codes subject  
to the condition that duplication of any grandfathered codes would not be requested  
in the new NPA. Any request for an exception shall be filed with the Director -

1 Utilities Division for review and approval in a reasonable timeframe. Staff will give  
2 the Commission notice upon receipt of the filing of the request and at the time of the  
3 Director's decision regarding this request.

- 4 e. That the Commission require prior notification by NANPA to Staff before any  
5 declaration of jeopardy in the 520 area code and implementation of a new allocation  
6 procedure.

7 CONCLUSIONS OF LAW

8 1. The Commission has jurisdiction over the subject matter of this investigation.

9 2. The recitals of Fact and Conclusions of Law set forth above are supported by the record  
10 and are hereby adopted as Findings of Fact and Conclusions of Law.

11 3. The record in this proceeding supports adoption of a two-way geographic split and Staff  
12 Recommendations in Findings of Fact No. 58 are reasonable, fair and equitable and therefore in the  
13 public interest.

14 ORDER

15 THEREFORE, IT IS ORDERED that the two-way geographic split with the existing 520 rate  
16 centers within Cochise, Pima, Pinal and Santa Cruz counties retaining the 520 NPA is hereby adopted.

17 IT IS FURTHER ORDERED that the permissive dialing shall begin on June 23, 2001,  
18 mandatory dialing begin on January 5, 2002 and the new NPA recorder announcement be in effect for  
19 all NXXs moved to the new NPA until at least March 9, 2002. NXXs reassigned from the new NPA  
20 into the 520 NPA may not have an effective date prior to March 9, 2002.

21 IT IS FURTHER ORDERED that the Industry develop a comprehensive customer education  
22 program for Commission Staff approval.

23 IT IS FURTHER ORDERED that the comprehensive education program shall set forth the  
24 costs of administering the program and a means by which those costs shall be paid by all  
25 telecommunications service providers based upon the number of NXX codes each telecommunications  
26 service provider controls.

27 IT IS FURTHER ORDERED that the comprehensive education program shall describe in  
28 detail the method used for billing and collection of such costs to the telecommunications service  
29 providers.

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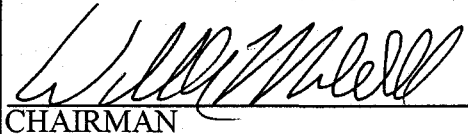
1 IT IS FURTHER ORDERED that the Industry shall file the comprehensive education program  
2 with the Commission within 60 days from the effective date of the Commission's Decision for  
3 approval by the Utilities Division Staff.

4 IT IS FURTHER ORDERED that Utilities Division Staff shall review the comprehensive  
5 education program within 30 days of the date the Industry files such report with the Commission and  
6 file with Docket Control a memorandum on its conclusions.

7 IT IS FURTHER ORDERED that NANPA provide Staff prior notification of any declaration  
8 of jeopardy in the 520 area code and implementation of a new allocation procedure.

9 IT IS FURTHER ORDERED that this Decision become effective immediately.

10  
11 **BY ORDER OF THE ARIZONA CORPORATION COMMISSION**

12   
13 CHAIRMAN

12   
13 COMMISSIONER

12   
13 COMMISSIONER

14 IN WITNESS WHEREOF, I, BRIAN C. McNEIL, Executive  
15 Secretary of the Arizona Corporation Commission, have  
16 hereunto, set my hand and caused the official seal of this  
17 Commission to be affixed at the Capitol, in the City of  
18 Phoenix, this 16th day of February, 2001.

19   
20 BRIAN C. McNEIL  
21 Executive Secretary

22 DISSENT: \_\_\_\_\_

23 DRS:RLB:lhms\MAS  
24  
25  
26  
27  
28



SERVICE LIST FOR: GENERIC INVESTIGATION ON INDUSTRY PETITION FOR  
APPROVAL OF AN NPA RELIEF PLAN FOR THE 520 NPA

DOCKET NO. T-00000F-99-0641

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Senior NPA Relief Planner, Western Region

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20 Wayne Mark  
21 Handy Page  
22 841 West Fairmount, Suite 5  
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30 Level 3 Communications  
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41 6910 Richmond Hwy  
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12 Washington, DC 20006
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15 Estacada, OR 97023
- 16 San Carlos Apache Telecommunications  
17 P.O. Box 158  
18 10 Tonto Street  
19 San Carlos, AZ 85550
- 20 Richard Watkins  
21 Smith Bagley, Inc. dba Cellular One of NE Arizona  
22 1500 South White Mountain Road  
23 Show Low, AZ 85901
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- 29 John Hayes  
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- 33 Manager External Relations  
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4 Christopher Kempley

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# 520 AREA CODE RELIEF PROPOSED GEOGRAPHIC SPLIT

